IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

CHRISTMAS TREE SHOPS, LLC, et al., 1

Debtors.

Chapter 7

Case No. 23-10576 (TMH)

(Jointly Administered)

GEORGE L. MILLER, in his capacity as Chapter 7 Trustee of CHRISTMAS TREE SHOPS, LLC *et al.*,

Plaintiff.

VS.

WESTERN EXPRESS, INC.,

Defendant.

Adv. Proc. No. 25-50883 (TMH)

PLAINTIFF'S REQUEST FOR ENTRY OF DEFAULT JUDGMENT

Plaintiff, George L. Miller, in his capacity as Chapter 7 Trustee (the "<u>Plaintiff</u>"), for the above-captioned debtors (the "<u>Debtors</u>"), has requested entry of default against the defendant, Western Express, Inc., (the "<u>Defendant</u>") in the above-captioned adversary proceeding.

Plaintiff requests that a default judgment in the amount of \$229,480.49 plus \$350.00 in Court costs be entered based on (a) the Entry of Default against Defendant [Docket No. 9], (b) the details of the Affidavit of Counsel in Support of (I) Plaintiff's Request for Entry of Default (the "Affidavit") [Docket No. 9-1], and (c) the Complaint for Avoidance and

The Debtors in these chapter 7 cases and the last four digits of each Debtor's U.S. tax identification number are as follows: Christmas Tree Shops, LLC (1207), Handil, LLC (1150), Handil Holdings, LLC (2891), Salkovitz Family Trust 2, LLC (8773), and Nantucket Distributing Co., LLC (1640).

Recovery of Preferential Transfers Pursuant to 11 U.S.C. §§ 547 & 550, with the accompanying Summons and Certificate of Service, attached to the Affidavit as Exhibit 1. A form of Entry of Default Judgment is attached hereto as <u>Exhibit A</u>.

Dated: November 17, 2025 PACHULSKI STANG ZIEHL & JONES LLP

/s/ Peter J. Keane

Bradford J. Sandler (DE Bar No. 4142)
Peter J. Keane (DE Bar No. 5503)
Edward A. Corma (DE Bar No. 6718)
919 North Market Street, 17th Floor
P.O. Box 8705

Wilmington, DE 19899-8705 (Courier 19801)

Telephone: (302) 652-4100 Facsimile: (302) 652-4400 Email: bsandler@pszjlaw.com pkeane@pszjlaw.com ecorma@pszjlaw.com

Counsel to Plaintiff George L. Miller, Chapter 7

Trustee